## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:19-CR-00277
v.	§	Judge Mazzant
	§	
ALAN IGNACIO MONTESINOS	§	
MORALES (30)	§	

## **MOTION FOR A PRELIMINARY ORDER OF FORFEITURE**

The United States respectfully requests that the Court issue a preliminary order of forfeiture in this case. In support of its motion, the government states as follows:

- 1. On July 8, 2020, a Grand Jury sitting in the Eastern District of Texas return a Third Superseding Indictment against Defendant **Alan Ignacio Montesinos Morales**, charging a violation of 21 U.S.C. § 846.
- 2. The Indictment included a Notice of Intention to Seek Criminal Forfeiture pursuant to 21 U.S.C. § 853 that provided notice that the government intended to seek forfeiture of Defendant's interest in the following:
  - a. Royal Sovereign Money Counter, Serial No. W18014830; and
  - b. 2014 dodge Challenger Coupe SXT, VIN 2C3CDYAG4EH111069.
- 3. **Alan Ignacio Montesinos Morales** appeared before United States Magistrate Judge Christine A. Nowak for the Eastern District of Texas, on July 1, 2021, and pleaded guilty to Count One of the Third Superseding Indictment, pursuant to a written plea agreement with the government. The plea agreement included a forfeiture

provision through which Defendant gave up all right, title, and interest in the abovedescribed property.

4. Upon the issuance of a Preliminary Order of Forfeiture, the United States will provide written notice to all third parties asserting a legal interest in any of the above-described property to be forfeited, and will publish notice at <a href="www.forfeiture.gov">www.forfeiture.gov</a> of the Court's Order and the United States' intent to dispose of the property to be forfeited in such manner as the Attorney General may direct.

## **Conclusion**

The government respectfully requests that the Court issue the proposed Preliminary Order of Forfeiture and forfeit to the government Defendant's interest in the aforementioned property.

Respectfully submitted,

NICHOLAS J. GANJEI Acting United States Attorney

101

ERNEST GONZALEZ
Assistant United States Attorney
Texas Bar No. 00789318
101 E. Park Blvd., Suite 500
Plano, Texas 75074
(972) 509-1201
(972) 509-1209 (fax)
Ernest.Gonzalez@usdoj.gov

## **CERTIFICATE OF SERVICE**

I certify that a copy	of this document w	as served by	electronic	filing to	opposing
counsel on July 2, 2021.					

/s/	
Ernest Gonzalez	